

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

RECEIVED  
OCT 6 - 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of

Amendment of Section 73.202(b),  
Table of Allotments,  
FM Broadcast Stations,  
(Delta, Colorado)

) MM Docket No. \_\_\_\_\_

) RM- \_\_\_\_\_

)

)

)

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

DOCKET FILE COPY ORIGINAL

**PETITION FOR RULEMAKING**

Blink Communications, Inc. ("BCI"), by and through counsel, and pursuant to §1.420(d) of the Commission's Rules (47 C.F.R. §1.420(d)), hereby submits its "Petition For Rulemaking" seeking the allotment of new FM Channel 277C2 to Delta, Colorado. In support whereof, the following is shown:

1. The community of Delta, Colorado, is presently served by two commercial stations, KDTA(AM), 1400 Khz, and KKLY(FM), 95.1 Mhz (236C). The public interest would be served by a grant of this proposal, for it would bring a third local service to Delta.

2. Attached hereto, as Exhibit 1, is an Engineering Statement in which it is demonstrated that Channel 277C2 can be allotted to Delta, Colorado, in accordance with the Commission's spacing constraints and city grade coverage requirements at a reference point of: N. Lat. 38° 23' 12" and W. Lng. 107° 40' 31."

No. of Copies rec'd \_\_\_\_\_  
List ABCDE \_\_\_\_\_

5. Should Channel 277C2 be allotted to Delta, Colorado, BCI will file an application for a construction permit for a new FM station on Channel 277C2 and, upon grant of the application, will construct the station.

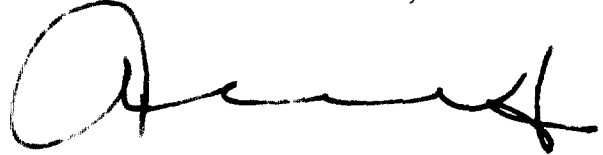
6. Accordingly, it is proposed that the Commission's FM Table of allotments be amended as follows:

<u>City</u>	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Delta, Colorado	236C	236C, 277C2

**WHEREFORE**, it is respectfully requested that a rulemaking proceeding be initiated to allot Channel 277C2 to Delta, Colorado.

Respectfully submitted,

**BLINK COMMUNICATIONS, INC.**



By: \_\_\_\_\_

Gary S. Smithwick  
Shaun A. Maher

Its Attorneys

**SMITHWICK & BELENDIUK, P.C.**  
1990 M Street, N.W.  
Suite 510  
Washington, D.C. 20036  
(202) 785-2800

October 5, 1995

BLNK1005.PET\DF

## **EXHIBIT 1**

*Broadcast Services of Colorado, Inc.*

5945 West Mississippi Avenue  
Lakewood, Colorado 80226  
(303) 727-9700  
Telecopier (303) 727-9770

August 12, 1995

**Engineering Statement**

On behalf of Blink Communications, Inc. of Delta, Colorado the entire commercial FM spectrum was carefully analyzed to determine the availability of a class C2 channel assignment at Delta, Colorado. The channel search resulted in the identification of channel 277, (103.3 Mhz.) on which a class C2 station could operate and meet all spacing requirements of Section 73.207 of the Commission's Rules and Regulations

Exhibit E1 is a computer separation study which shows the availability of channel 277 from the designated site. All pertinent co-channel and adjacent channel assignments are shown along with their licensed class, coordinants and file numbers

Exhibit E2 is a separation map showing the area available for a class C2 transmitter on channel 277.

The proposed site will provide the necessary 3.16 mV/m city grade service contour over the entire city of Delta.

The assignment will provide Delta, Colorado with it's third local radio service. Further, the petitioner has indicated it's willingness to apply for channel once it has been assigned.

Paul Montoya

  
\_\_\_\_\_  
Broadcast Services of Colorado, Inc.

# EXHIBIT E1

Broadcast Service of Colorado, Inc.  
5945 W. Mississippi Ave., Lakewood, CO 80226

August 15, 1995

## FM Spacing Study

On behalf of: Blink Communications, Inc.  
Channel 277C2 (103.3 MHz)  
Database: FCC 07/06/95

Latitude: 38-23-12  
Longitude: 107-40-31  
Safety zone: 65 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
<b>KZDG</b>	<b>LIC</b>	<b>Premiere Radio Networks,</b>	223C1	57DA	40-05-47	50.6	305.6	27
Greeley	CO	BLH-940426KB	92.5	377	104-54-04	232.4	278.6	<b>CLEAR</b>
DA: oddball ODD930630IG @ 0 deg								
<b>ALLOC</b>			224A		39-32-36	13.3	132.0	15
Glenwood Springs	CO	DOC-93-34	92.7		107-19-18	193.5	117.0	<b>CLEAR</b>
Filing window 09/11-10/12/93 **CLOSED**								
<b>KIKX-FM CP</b>	<b>Wiskes/Abaris Communicat</b>		274C	72	38-44-43	79.9	248.5	105
Manitou Springs	CO	BPH-950105IB	102.7	695BT	104-51-41	261.6	143.5	<b>CLEAR</b>
<b>ALLOC</b>			275C		37-01-45	196.4	157.0	105
Kirtland	NM		102.9		108-10-36	16.1	52.02	<b>CLEAR</b>
Filing window 04/24-05/25/95 **CLOSED**								
<b>NEW</b>	<b>APC</b>	<b>Basin Broadcasting Co.</b>	275C	100	36-56-30	184.4	160.9	105
Kirtland	NM	BPH-950525MM	102.9	303	107-48-55	4.3	55.85	<b>CLEAR</b>
<b>ALLOC</b>			276C2		39-36-58	37.4	172.9	130
Avon	CO	DOC-88-253	103.1		106-26-57	218.2	42.94	<b>CLEAR</b>
<b>KZYR</b>	<b>CP</b>	<b>Rocky Mountain Radio Com</b>	276C2	13.5	39-38-08	37.0	174.8	130
Avon	CO	BPH-940124JA	103.1	140	106-26-46	217.8	44.80	<b>CLEAR</b>
<b>KZYR</b>	<b>APC</b>	<b>Rocky Mountain Radio Com</b>	276C2	12	39-38-08	37.0	174.8	130
Avon	CO	BMPH-950208IA	103.1	149	106-26-46	217.8	44.80	<b>CLEAR</b>
<b>PRM</b>	<b>ADD</b>	<b>Rule Communications and</b>	277C		41-30-12	10.6	352.4	249
Saratoga	WY	DOC-95-98	103.3		106-53-50	191.1	103.4	<b>CLEAR</b>
<b>ALLOC</b>			278C		39-43-50	53.9	258.6	188
Denver	CO		103.5		105-14-07	235.4	70.58	<b>CLEAR</b>
<b>KTRN</b>	<b>CP</b>	<b>Kenneth B. Kendrick</b>	279C2	26	37-48-35	179.2	64.05	58
Silverton	CO	BPH-921019MB	103.7		107-39-53	359.2	6.046	<b>CLOSE</b>
<b>ALLOC</b>			279C2		37-41-54	186.9	76.96	58
Silverton	CO		103.7		107-46-52	6.9	18.96	<b>CLEAR</b>
<b>KSNO-FM LIC</b>	<b>Rocky Mountain Radio Com</b>		280A	2.50	39-14-51	34.1	115.9	55
Snowmass Village	CO	BLH-850404KK	103.9	99	106-55-13	214.6	60.89	<b>CLEAR</b>
DOC-82-503								
<b>ALLOC</b>			280A		39-14-51	34.1	115.9	55
Snowmass Village	CO		103.9		106-55-13	214.6	60.89	<b>CLEAR</b>

>> End of channel 277C2 study <<

Broadcast Service of Colorado, Inc.  
5945 W. Mississippi Ave., Lakewood, CO 80226

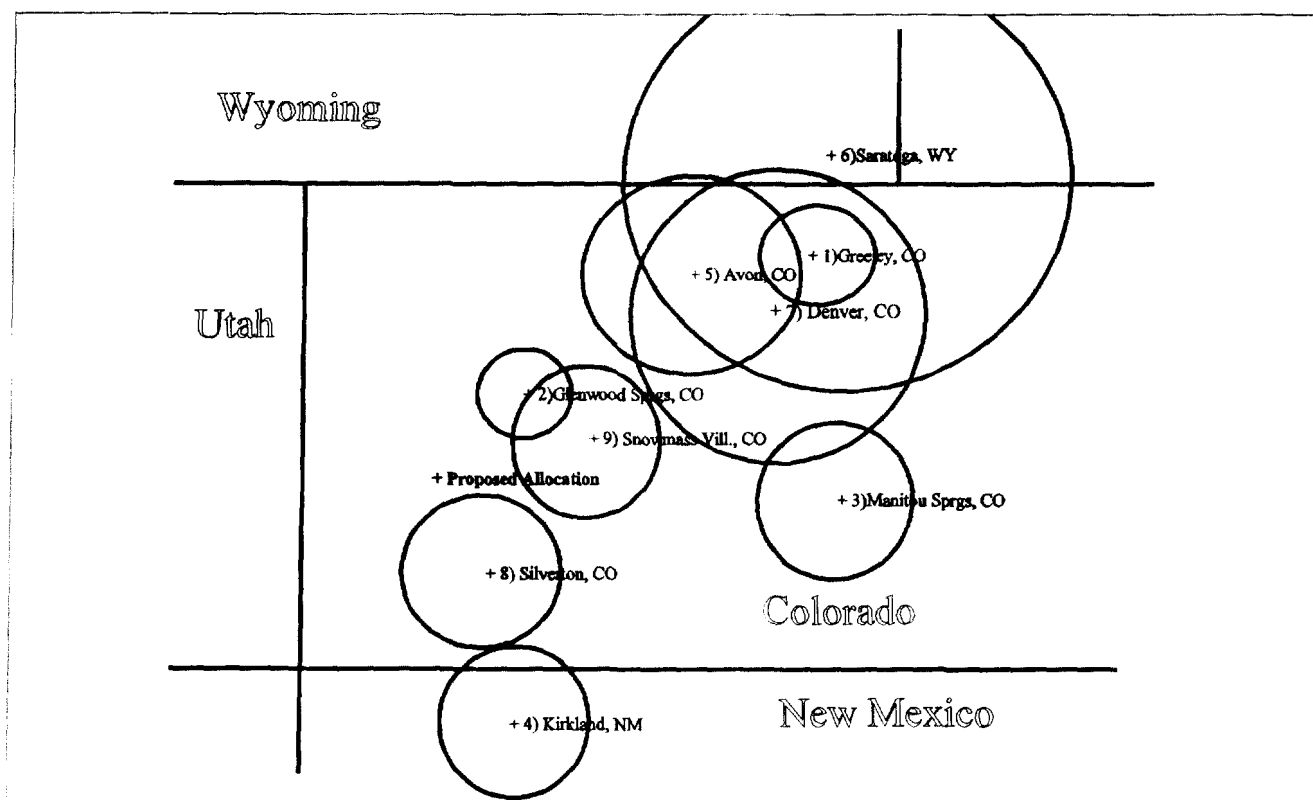
August 15, 1995

## FM Spacing Study

On behalf of: Blink Communications, Inc  
Channel 277C2 (103.3 MHz)  
Database: FCC 07/06/95

Latitude: 38-23-12  
Longitude: 107-40-31  
Safety zone: 65 km

Point	Call	Channel	Location	Dist. (km.)	Dist. Req. (km)	Margin (km.)	
1)	KZDG	223C1	Greeley, CO	305.6	27	278.6	CLEAR
2)	ALLOC	224A	Glenwood Spgs, CO	132.0	15	117.0	CLEAR
3)	KIKX-FM CP	274C	Manitou Spgs, CO	248.5	105	143.5	CLEAR
4)	ALLOC	275C	Kirtland, NM	157.0	105	52.02	CLEAR
	NEW APC	275C	Kirtland, NM	160.9	105	55.85	CLEAR
5)	ALLOC	276C2	Avon, CO	172.9	130	42.94	CLEAR
	KZYR CP	276C2	Avon, CO	174.8	130	44.80	CLEAR
	KZYR APC	276C2	Avon, CO	174.8	130	44.80	CLEAR
6)	PRM ADD	277C	Saratoga, WY	352.4	249	103.4	CLEAR
7)	ALLOC	278C	Denver, CO	258.6	188	70.58	CLEAR
8)	KTRN CP	279C2	Silverton, CO	64.05	58	6.046	CLOSE
	ALLOC	279C2	Silverton, CO	76.96	58	18.96	CLEAR
9)	KSNO-FM LIC	280A	Snowmass Vill., CO	115.9	55	60.89	CLEAR
	ALLOC	280A	Snowmass Vill., CO	115.9	55	60.89	CLEAR



## Statement of Qualifications

I, Paul Montoya, declare that I have worked in the broadcast engineering profession for the last twenty-one years and have prepared numerous engineering documents before the Federal Communications Commission;

That, I have held a Federal Communications Commission First Class Radiotelephone License, now a lifetime General Radiotelephone License since 1975;

That, I am certified by the Society of Broadcast Engineers, Indianapolis, Indiana;

That, my qualifications are a matter of record with the Federal Communications Commission;

That, I have been retained by Blink Communications, Inc. of Delta, Colorado to prepare the engineering showings and the technical exhibits appended hereto;

That, I do swear that the technical information contained in same and the facts stated therein are true of my knowledge

  
\_\_\_\_\_  
Paul Montoya

August 12, 1995